

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04-CV-10945-RGS

FILED
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U.S. DISTRICT COURT
DISTRICT OF MASS.

**DAVID NAGER & ASSOCIATES, INC.,)
Plaintiff,)**

v.)

**UNIVERSAL AUTOMOTIVE, INC.,)
Defendant.)**

MOTION FOR ENTRY OF DEFAULT—RULE 55(a)

Pursuant to Fed. R. Civ. P. 55(a), Plaintiff David Nager & Associates, Inc. ("Plaintiff") hereby moves for entry of default against Defendant Universal Automotive, Inc. ("Defendant") for the reasons set forth below:

1. The Complaint in the captioned action was served by a process server on Defendant on May 25, 2004. Service was made upon Mitchell D. Goldsmith, 444 N. Michigan Avenue, Chicago, Illinois 60611. See Return of Service, filed June 9, 2004. Mr. Goldsmith is listed as Defendant's registered agent, located at the aforementioned address, on the Illinois Secretary of State's website, where Defendant is listed as a domestic corporation. See Affidavit of Molly Cochran, filed herewith.


2. The twenty days in which Defendant was required to answer or otherwise plead in response to the Complaint ended on June 14, 2004. No responsive pleading has been served on Plaintiff to date.

Therefore, Plaintiff respectfully requests that default be entered against Defendant.

Date: June 25, 2004

DAVID NAGER & ASSOCIATES, INC.

By its attorneys,



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